

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

CONNECT AMERICA HOLDINGS,	:	
LLC, CONNECTAMERICA.COM, LLC,	:	
and KENNETH GROSS,	:	CIVIL ACTION
	:	
Plaintiffs,	:	NO. 14-4784-TJS
	:	
v.	:	
	:	
ARCH INSURANCE COMPANY	:	
	:	
Defendant.	:	
	:	

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**DEFENDANT ARCH INSURANCE COMPANY’S MOTION TO EXCLUDE THE  
OPINIONS OF BERND G. HEINZE PURSUANT TO *DAUBERT V. MERRELL DOW***

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Pursuant to *Daubert v. Merrell Dow*, 509 U.S. 579 (1993), and Federal Rule of Evidence 702, Defendant Arch Insurance Company moves to exclude the opinions of Bernd G. Heinze from Phase One of this case, which is solely focused on issues of coverage. The basis for this motion is set forth in the accompanying memorandum of law.

Dated: May 1, 2015

Respectfully submitted,

/s Ronald P. Schiller

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